

Ex. 5 Deliberative Process (DP)

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From: Wayne Miller [mailto:Miller.Wayne@azdeq.gov]
Sent: Wednesday, July 11, 2018 4:20 PM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>
Cc: steve <steve@uxopro.com>
Subject: 2018-7-11 - wafb -FYI -ADEQ informal thoughts on ST012 EBR Hold & USAF well install-GW sample-pump test

Carolyn - Hope your time away from office off was good. Just wanted to let you know that Monday, July 16, 2018, I am to meet with ADEQ Waste Program Division Managers to discuss EPA's 7-3-2018, *Demonstration of Hydraulic Containment at ST12 Fuels Spill Site, Former Williams Air Force Base, Mesa Arizona* letter to USAF.

This may change, but what I am hearing so far is:

- (1) ADEQ reiterating that EBR Remedy should be implemented now
- (2) ADEQ supporting USAF's verbal concurrence that multiple remedial-action capture events may be required (USAF's Phil Mook has *verbally* indicated that USAF may re-visit the remedy and the remedy implementation steps). Over the 20-year time-to-remedy duration (ends 2035), monitor and capture wells can be placed beyond the current "work" area perimeter. USAF's contractor has "modeled"

groundwater and contaminant transport direction and distance. *[This is the part where more wells are installed.]*

(3) ADEQ advocating that the remedy's Monitored Natural Attenuation (MNA) phase can be delayed to a time period closer to the 20-year time-to-remedy end date. The current USAF remedy has MNA starting before 2022.

The abbreviated internal discussions so far have shown agreement with EPA's philosophical and technical reasoning. HOWEVER; ADEQ management returns to the ROD, Amendment 2. Both for aquifer restoration commitment and the time-to-remedy.

The aquifer will be restored wherever the plume migrates. And USAF will use a remedy that restores the aquifer. The time frame will be however long it takes to restore the aquifer. This 2nd Amendment time-to-remedy is just another time estimate that is shorter than the initial do-nothing estimate.

Anyway, just where ADEQ is at now, but may change on Monday.

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